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March 28, 2025

The request to seal Exhibit E is granted.

SO ORDERED:

04/01/2025

A handwritten signature in black ink, appearing to be 'R. Lehrburger', is written over a horizontal line.

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

**VIA ECF**

Hon. Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Allstate Insurance Co., et al. v. Charles Deng et al.*, 25-mc-137 (GHW)**  
**Application to File Motion Exhibits Under Seal**

Dear Judge Woods:

Along with Cadwalader Wickersham and Taft LLP, we represent Petitioners in the above-referenced matter and write pursuant to Rule 4.A.ii of the Court's individual practices to request permission to file an exhibit under seal related to Petitioners' Motion to Compel Compliance with document subpoenas issued to Charles Deng and Charles Deng Acupuncture, P.C. ("Respondents") on December 20, 2024 ("Motion to Compel"). Exhibit "E" (ECF No. 3-5), identified in the Declaration of Lee Pinzow in Support of Petitioners' Motion to Compel ("Pinzow Decl."), is the exhibit Petitioners seek to file under seal. Petitioners omitted Exhibit "E" as required for confidential documents pursuant to a Confidentiality Order issued in the underlying matter, *Allstate Ins. Co. et al. v. Rybak, et al.*, 22-CV-04441 (SJB) (hereinafter the "Rybak Matter"), pending in the Eastern District of New York (ECF No. 66), as it contains confidential bank records and financial information of the Respondents, obtained through discovery in the Rybak Matter. A copy of the Confidentiality Order is annexed hereto as Exhibit "1." As these records and information are deemed confidential in the Rybak Matter, Petitioners respectfully request leave to file Exhibit "E" under seal, at the ECF Viewing Level "Ex Parte,"<sup>1</sup> consistent with the

<sup>1</sup> When Petitioners serve the Motion to Compel on the Respondents (with a cover page for Exhibit "E" indicating it is the subsection of an application to file a document under seal), Petitioners will provide the



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procedure set by the Confidentiality Order for use of confidential information and documents in legal papers.<sup>2</sup>

We thank the Court for its consideration in this regard.

Respectfully Submitted,

**MANNING | KASS**

/s/ Lee P. Pinzow

Lee Pinzow, Esq.

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Respondents with a copy of the Confidentiality Order entered in the Rybak Matter and the opportunity to elect to be bound by the order, thus permitting Petitioners to disclose to the Respondents the confidential documents and information contained in Petitioners' Exhibit "E." *See* Exhibit. 1 at §§ 5, 6, 11.

<sup>2</sup> Section 11 of the Confidentiality Order directs the party seeking to introduce confidential documents and information in a court filing to file unredacted papers and documents under seal and simultaneously file a redacted version with the confidential information omitted. *See* Exhibit. 1 at §11.